

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN**

SOUTHERN DIVISION

In re

CITY OF DETROIT, MICHIGAN,

Debtor.

Chapter 9

Case No. 13-53846

Hon. Steven W. Rhodes

Expedited Consideration Requested

**DEBTOR'S EX PARTE MOTION FOR AN ORDER EXTENDING THE
DEADLINE FOR COMPLETING DEPOSITIONS SET FORTH IN THE
COURT'S ORDER SHORTENING NOTICE AND SCHEDULING AN
EXPEDITED HEARING WITH RESPECT TO MOTION
FOR AN ORDER APPROVING SETTLEMENT AND
PLAN SUPPORT AGREEMENT [DOCKET NO. 2913]**

The City of Detroit hereby moves for the entry of an order extending the deadline for completion of depositions set forth in the Court's Order Shortening Notice and Scheduling an Expedited Hearing with Respect to Motion for an Order Approving Settlement and Plan Support Agreement [Docket No. 2913] (the "Scheduling Order").

The Scheduling Order currently provides that all depositions of the City's witnesses must be completed by March 25, 2014. The City agreed to make its witnesses, Kevyn Orr and Gaurav Malhotra, available on March 19, 2014 for their depositions. However, certain documents requested by objectors, which the City

has agreed to produce (specifically, the final execution draft of the Settlement and Plan Support Agreement, any exhibits to be used by the City in examining Mr. Malhotra at the hearing, and an updated privilege log) are not yet available. At least one objector has indicated to the City that if such documents are not made available prior to the depositions, the objector will insist upon another round of depositions after the documents do become available.

In the interest of efficiency and the avoidance of multiple depositions, the City requests a brief, six-day extension of the deposition deadline, until March 31, 2014. Both Mr. Orr and Mr. Malhotra will be available for their depositions on or before March 31, 2014, and the City will provide the requested documents to the objectors sufficiently in advance of the depositions to enable them adequately to prepare.

WHEREFORE, the City respectfully requests that the Court enter an order, substantially in the form attached as Exhibit 1, extending the deposition deadline until March 31, 2014 and granting further relief as the Court deems appropriate.

Dated: March 17, 2014

Respectfully submitted,

/s/ Deborah Kovsky-Apap

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EXHIBIT 1

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN**

SOUTHERN DIVISION

In re

CITY OF DETROIT, MICHIGAN,

Debtor.

Chapter 9

Case No. 13-53846

Hon. Steven W. Rhodes

**ORDER GRANTING DEBTOR'S *EX PARTE* MOTION FOR AN ORDER
EXTENDING THE DEADLINE FOR COMPLETING DEPOSITIONS SET
FORTH IN THE COURT'S ORDER SHORTENING NOTICE AND
SCHEDULING AN EXPEDITED HEARING WITH RESPECT TO
MOTION FOR AN ORDER APPROVING SETTLEMENT AND
PLAN SUPPORT AGREEMENT [DOCKET NO. 2913]**

This matter coming before the Court on Debtor's *Ex Parte* Motion (the "Motion") for an Order Extending the Deadline for Completing Depositions Set Forth in the Court's Order (the "Scheduling Order") Shortening Notice and Scheduling an Expedited Hearing with Respect to Motion for an Order Approving Settlement and Plan Support Agreement [Docket No. 2913]; and good and sufficient cause having been shown;

IT IS HEREBY ORDERED THAT:

1. The Motion is **GRANTED**.

2. The deadline to complete depositions pursuant to the Scheduling Order is hereby extended until March 31, 2014.

3. All other provisions of the Scheduling Order remain in full force and effect.